

FILED
5/6/2025

GMM

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

SHAUN BROUWER

Case No.

Violation: Title 18, United States
Code, Section 1341**INFORMATION****1:25-cr-00252**

The UNITED STATES ATTORNEY charges: **Judge Jeffrey I Cummings**
Magistrate Judge Heather K. McShain
RANDOM / Cat. 3

1. At times material to this information:

a. Company A was headquartered in the Northern District of Illinois and manufactured computer networking products, including jack modules and fiber optic connectors (“Company A Products”).

b. SHAUN BROUWER was employed as an engineer at Company A from approximately 2001 to November 2019. Through BROUWER’s employment at Company A, BROUWER received information about the construction, design, and appearance of Company A Products and packaging material, which displayed Company A’s name and registered trademark.

c. In approximately January 2016, BROUWER established a company in Indiana named Dreamfinder Enterprises, LLC (“Dreamfinder”). BROUWER was the owner and sole member of Dreamfinder.

d. Company A did not authorize BROUWER to sell Company A Products for his own personal profit, and Dreamfinder was not an authorized reseller of Company A Products.

e. Amazon.com, Inc. and eBay Inc. were online vendor platforms that allowed individuals and entities, including BROUWER and his associated entities, to advertise and sell items directly to customers online. Amazon.com Inc. utilized interstate carriers, including its subsidiary Amazon Logistics, Inc., in order to transport items to its customers.

f. Co-Schemers A, B, and C were businesses located in China that manufactured and sold various products.

g. The Paycheck Protection Program (PPP) was a federal loan program that offered forgivable loans to small businesses suffering economic losses caused by the COVID-19 pandemic. To receive a PPP loan, a business was required to make certain certifications regarding its eligibility, including that the business “was not engaged in any activity that is illegal under federal, state or local law,” which certification was material to lenders’ approval of the loan.

2. Beginning in or around February 2017, and continuing until in or around March 2021, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHAUN BROUWER,

defendant herein, together with Co-Schemers A, B, and C, and others, knowingly devised, intended to devise, and participated in a scheme to defraud Company A, and to obtain money and property of Company A by means of materially false and fraudulent pretenses, representations, and promises, which scheme is further described below.

3. It was part of the scheme that BROUWER used his access to Company A Products and information for his own personal benefit by (a) acquiring Company A Products from Company A under false pretenses and then selling them for profit; and (b) assisting Co-Schemers A, B, and C, and others, in their design and packaging of counterfeit Company A Products, which BROUWER then falsely advertised as authentic Company A Products and resold for profit.

4. It was further part of the scheme that, in approximately February 2017, BROUWER requested that Company A send him approximately 11,267 jack modules under the false pretense that he intended to display the products at industry trade shows to promote Company A's business, when in fact, BROUWER intended to and did sell those products through eBay Inc. and Amazon.com, Inc. for his own personal profit.

5. It was further part of the scheme that, starting in approximately January 2018, BROUWER purchased what he knew to be counterfeit Company A Products from Co-Schemers A, B, and C, and other entities located in China, so that BROUWER could resell the counterfeit products for his own personal profit.

6. It was further part of the scheme that BROUWER instructed Co-Schemers A, B, and C, and others to copy the appearance of Company A Products and falsely label the packaging with Company A's registered trademark, so that the counterfeit Company A Products would appear legitimate.

7. It was further part of the scheme that BROUWER sold counterfeit Company A Products that he falsely advertised to customers as authentic Company

A Products through eBay Inc. and Amazon.com, Inc. for BROUWER's own personal profit.

8. It was further part of the scheme that, after Company A was alerted to BROUWER's sales of counterfeit Company A Products, BROUWER changed his user and store vendor names on eBay Inc. and Amazon.com, Inc., and continued to sell counterfeit Company A Products under different names to conceal the scheme.

9. It was further part of the scheme that, in approximately April 2020, BROUWER applied for and received a PPP loan for Dreamfinder in the amount of approximately \$20,832. In the PPP application, BROUWER falsely certified that he "was not engaged in any activity that is illegal under federal, state or local law," knowing that the certification was false.

10. It was further part of the scheme that BROUWER used a portion of the PPP loan proceeds to continue his sales of counterfeit Company A products.

11. It was further part of the scheme that BROUWER misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, the existence of the scheme, the purposes of the scheme, and acts done in furtherance of the scheme.

12. On or about June 9, 2020, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHAUN BROUWER,

defendant herein, for the purpose of executing the above-described scheme, did knowingly cause to be delivered by Amazon Logistics, Inc., a commercial interstate carrier, according to the direction thereon, a package addressed to Chicago, Illinois, containing approximately five counterfeit Company A jack modules;

In violation of Title 18, United States Code, Section 1341.

FORFEITURE ALLEGATION

The UNITED STATES ATTORNEY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1341, as set forth in this information, defendant SHAUN BROUWER shall forfeit to the United States of America any property which constitutes and is derived from proceeds traceable to the offense, including a personal money judgment, as provided in Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. If any of the property described above, as a result of any act or omission, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

MICHELLE
PETERSEN

Digitally signed by MICHELLE
PETERSEN
Date: 2025.05.05 17:13:51 -05'00' for ASB

UNITED STATES ATTORNEY